

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re

LORDSTOWN MOTORS CORP., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Obj Deadline: November 21, 2023 at 4:00 p.m. (ET)

Hearing Date: *Only if objections are filed*

NOTICE OF SECOND MONTHLY FEE APPLICATION OF  
BAKER & HOSTETLER LLP, AS SPECIAL LITIGATION AND CORPORATE  
COUNSEL FOR THE DEBTORS, FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF  
AUGUST 1, 2023 THROUGH AUGUST 31, 2023

**PLEASE TAKE NOTICE** that Baker & Hostetler LLP (“**B&H**”) has filed the attached *Second Monthly Fee Application of Baker & Hostetler LLP for Allowance of Compensation and Reimbursement of Expenses as Special Litigation and Corporate Counsel for the Debtors for the Period from August 1, 2023 through August 31, 2023* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, DE 19801 (the “**Bankruptcy Court**”).

**PLEASE TAKE FURTHER NOTICE** objections, if any, to the Application must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members*, entered July 25, 2023 [D.I. 181] (the “**Interim Compensation Order**”) and must be filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, DE 19801, and be served upon and received by (a) counsel to the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”), (i) White & Case LLP, 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131 (Attn: Thomas E. Lauria (tlauria@whitebase.com), Matthew C. Brown (mbrown@whitecase.com), and Fan B. He (fhe@whitecase.com)); (ii) White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020 (Attn: David M. Turetsky (david.turetsky@whitecase.com)); (iii) White & Case LLP, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606 (Attn: Jason N. Zakia (jzakia@whitecase.com)); and (iv) White & Case LLP, 555 South Flower Street, Suite 2700, Los Angeles, CA 90071 (Attn: Roberto Kampfner (rkampfner@whitecase.com)); (b) proposed counsel to the Debtors, Womble Bond Dickinson (US) LLP, 1313 North Market Street, Suite 1200, Wilmington, DE 19801 (Attn: Donald J. Detweiler (don.detweiler@wbd-us.com) and Morgan L. Patterson (morgan.patterson@wbd-us.com)); (c) counsel to the Official Committee of Unsecured Creditors, (i) Troutman Pepper Hamilton Sanders LLP, Hercules Plaza, Suite 5100, 1313 N. Market Street, Wilmington, DE

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address 27000 Hills Tech Ct., Farmington Hills, MI 48331.

19801 (Attn: David M. Fournier (david.fournier@troutman.com), Marcy J. McLaughlin Smith (marcy.smith@troutman.com), and Tori L. Remington (tori.remington@troutman.com)); (ii) Troutman Pepper Hamilton Sanders LLP, 3000 Tow Logan Square, 18<sup>th</sup> & Arch Streets, Philadelphia, PA 19103-2799 (Attn: Francis J. Lawall (francis.lawall@troutman.com)); (iii) Troutman Pepper Hamilton Sanders LLP, 875 Third Avenue, New York, NY 10022 (Attn: Deborah Kovsky-Apap (deborah.kovsky@troutman.com)); and (iv) Troutman Pepper Hamilton Sanders LLP, 4000 Town Center, Suite 1800, Southfield, MI 48075 (Attn: Sean P. McNally (sean.mcnally@troutman.com)); (d) proposed counsel to the Official Committee of Equity Security Holders, Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, DE 19801 (Attn: Eric J. Monzo, Brya M. Keilson); (e) proposed counsel to the Official Committee of Equity Security Holders, (i) Brown Rudnick LLP, 7 Times Square, New York, NY 10036 (Attn: Robert J. Stark (rstark@brownrudnick.com) and Bennet S. Silverberg (bsilverberg@brownrudnick.com)), and (ii) Brown Rudnick LLP, One Financial Center, Boston, MA 02111 (Attn: Matthew A. Sawyer (msawyer@brownrudnick.com)); (f) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, DE 19801 (Attn: Benjamin A. Hackman (Benjamin.A.Hackman@sdoj.gov)); (g) the Applicant, Baker & Hostetler LLP, Key Tower, 127 Public Square, Suite 2000, Cleveland, OH 44114 (Attn: Michael A. VanNiel (mvanniel@bakerlaw.com)) by no later than **4:00 p.m. (prevailing Eastern Time) on November 21, 2023 (the “Objection Deadline”)**.

PLEASE TAKE FURTHER NOTICE that if any responses or objections to the Application are timely filed, served and received in accordance with this notice, a hearing on the Application will be held at the convenience of the Bankruptcy Court. Only those objections made in writing and timely filed and received in accordance with the Interim Compensation Order and the procedures described herein will be considered by the Bankruptcy Court at such hearing.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Interim Compensation Order, if no objection to the Application is timely filed, served and received by the Objection Deadline, B&H may be paid an amount equal to the lesser of (i) 80 percent (80%) of the fees and 100 percent (100%) of the expenses requested in the Application or (ii) 80 percent (80%) of the fees and 100 percent (100%) of the expenses not subject to an objection without the need for further order of the Bankruptcy Court.

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Dated: November 1, 2023

**WOMBLE BOND DICKINSON (US) LLP**

/s/ Morgan L. Patterson

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Morgan L. Patterson (Bar No. 5388)  
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*Proposed Counsel to the Debtors and Debtors in Possession*

-and-

**BAKER & HOSTETLER LLP**

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*Special Litigation and Corporate Counsel for the Debtors*